

INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST

- 1 -

THE UNITED STATES OF AMERICA, et al

vs

ARAKI, Sadao, et al

- Defendants -

REQUEST FOR PRODUCTION OF WITNESSES

1. NOW COMES HIRANUMA, Kiichiro and requests the Tribunal, in accordance with Section III, Article 9 (e) of the Charter, to order the production of the following witnesses necessary for his defense:

A. TAKEUCHI, Kekuji;

(a) The nationality of the witness is Japanese;

(b) The witness is now in Tokyo City, Setagaya-ku,
Kamikitazawa 3-chome, No. 877;

B. MURAKAMI, Kyoichi;

(a) The nationality of the witness is Japanese;

(b) The witness is now in Tokyo City, Musashino-machi
Kichizyozi Hondemninami, No. 2546;

C. OTA, Kozo;

(a) The nationality of the witness is Japanese;

(b) The witness is now in Sugamo Prison, Tokyo, Japan,
a prisoner of the Allies;

D. KAYABA, Gunzo;

(a) The nationality of the witness is Japanese;

(b) The witness is now in Urawa City, Maezi, No. 98;

E. BABA, Tsunego;

(a) The nationality of the witness is Japanese;

(b) The witness is now in Tokyo City, Kojimachi-ku
Yuraku-cho, I-chome, No. 13, at Yomiuri press;

2. The defendant HIRANUMA further requests the Tribunal, in accordance with Section III, Article 9 (e) of the Charter, to

order the production of the following documents necessary for his defense:

<u>DOCUMENT</u>	<u>LOCATION</u>
A. Original copy of the judgment given by the Tokyo district Criminal Court on 8 November 1944, in a criminal case brought against KATAOKA (Shun) NAKAMURA (Takashi), NISHIYAMA (Choku), DOI (Seburo);	Prosecutor's (Prosecutor's) Office, Tokyo District Criminal Court, Hibiya Kojimachiku, Tokyo.
B. "Tokyo Record", a book written by Otto D. Tolischus and published by Hamish Hamilton, London and George Jaboor Melbourne;	U.S.A.A.F.F.E. Orientation Reference Library, 2nd Floor, Mitsubishi Shoji Building, Marunouchi Kojimachiku, Tokyo.
C. (1) "Special Police Monthly Journal" (Tokko Geppo), all numbers published in 1939, 1941 and 1944;	These magazines and books are publications of the Japanese Home Ministry and are in the custody of the Counter Intelligence Section (CIS) or the Legal Section of the Supreme Commander for the Allied Powers (SCAP).
C. (2) "General Survey of the Social Movements During the Years 1939 - 1941" (Shakai Undo Gaikei);	
D. The Minutes of the Privy Council Conference held in 1932 with respect to the issuance of government bond for the purpose of defraying the military expenses of the Manchurian Incident;	Archives of the Chancellery of the Privy Council, Wadakuremon Kojimachiku, Tokyo.
3. The facts to be proved by these witnesses and documents will show the policies, utterances, actions and intent of the accused HIRANUMA during the time in which he is charged by the Indictment;	
4. The relevance of the testimony of these witnesses, all of whom were associated with the accused HIRANUMA in various capacities during the time charged in the Indictment is, in its tendency, to establish that the accused HIRANUMA took no part in any of the conspiracies charged to him; and was not in any way connected with the planning, initiating or waging of wars of aggression; and was, furthermore, in no way connected with the commission of any crimes against peace;	
5. The date upon which attendance of the witnesses will be required for testifying cannot at this time be stated accurately but their attendance for consultation with defense counsel is required forthwith;	

6. The date of production of the above documents will be after the commencement of the defense of the accused HIRANUMA. Consequently, in view of the time needed in processing and translating, a court order of an early date is prayed for.

HIRANUMA, Kiichiro

By

USAMI, Hokuro